



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



## Water Pollution Control Laboratory

6543 N Burlington Avenue, Bldg 217, Portland, Oregon 97203 ■ Nick Fish, Commissioner ■ Michael Jordan, Director

February 14, 2019

Robin Johnston  
Univar USA Inc.  
3950 NW Yeon Ave.  
Portland, OR 97210

COPY

RE: **NPDES Industrial Stormwater Discharge General Permit Required**  
Stormwater Facility Inspection of Univar USA Inc. located at 3950 NW Yeon Ave.

Dear Ms. Johnston,

The City of Portland (City) inspected the Univar facility on February 6, 2019 to determine whether or not a National Pollutant Discharge Elimination System (NPDES) stormwater permit is required based on operations at this site.

Regulations for the Portland Harbor area of the Willamette River watershed require businesses with specific SIC codes or the exposure of industrial activities, including significant materials remaining onsite from former activities, to rainfall and discharge to surface waters to apply for a stormwater permit.

NPDES regulations state that industries with your primary Standard Industrial Classification (SIC) code(s) 5169-Chemicals and Allied Products distribution is a SIC code not included in Table 1 of the 1200Z permit. The recent visit confirmed that the following activities which are included on Table 2 of the 1200Z permit are taking place on-site and are exposed to stormwater:

- Maintenance of vehicles, including washing
- Materials storage, including full and empty totes and storage containers and bulk liquids
- Waste Handling, including a 10-day hazardous waste transfer facility which is located in a covered area with sumps that are typically kept closed, but collect stormwater and are manually drained, upon an inspection

In addition, the Univar facility activities include co-located activities related to the transportation of hazardous wastes. These activities fall under the SIC code 4212- local trucking, including refuse local collecting and transporting; without disposal. This co-located activity should be included on the 1200Z application form and the SWPCP.

**Univar is determined to have exposure of industrial activities to stormwater and is required to apply for a 1200-Z stormwater permit.**

The enclosed permit application packet contains (1) the permit application with instructions, (2) a Land Use Compatibility Statement, (3) an SWPCP Checklist that must be filled out along with your submittal and (4) a laboratory and consultant list for your reference.

A Stormwater Pollution Control Plan (SWPCP) must be developed and submitted as part of your permit application as both a hard copy and an electronic copy, preferably as a \*.pdf.

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Per Section B.3. of the permit application, the facility discharges to a waterbody that is impaired without a TMDL. The list of impairment pollutants, and the applicable water quality standard for which the water body is impaired is enclosed for your reference. The application packet and SWPCP must meet one of the three conditions provided in Section B.3 of the permit application. As we discussed, Univar has recently completed stormwater system sampling. Please ensure the recent stormwater sampling results are provided with the application package, to demonstrate that the property is not expected to cause or contribute to an exceedance of the water quality standards for which the Willamette River is impaired.

**If your permit application is not submitted within forty-five (45) days of receiving this letter, the matter may be referred to DEQ for enforcement.**

Corrective Actions:

In addition to the submittal of the 1200-Z permit application the following item (or similar) must be included as site controls described in the SWPCP and completed **as soon as possible (and no later than 90 days from the date of permit issuance, per Schedule A.12.d of the 1200-Z permit)** in order to prevent stormwater pollution:

1. Provide covering and containment for the DEF dispensing tank, and other non-water liquid containers stored outside.

Additional Items:

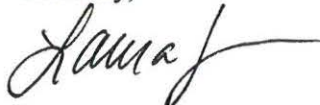
1. The facility plumbing records indicate that drywells are present on the property. The DEQ Facility Profiler webpage lists Unregistered UIC #14232. The plumbing records have been referred to DEQ UIC staff for follow up.
2. During the inspection we discussed the City's Access authorization process for sampling in the City stormwater system for 1200Z permit sample collection and visual observations. The City has a process for applying for an access agreement that can be found here:  
<https://www.portlandoregon.gov/bes/article/575227>
3. The facility has a boiler which discharges to a tote where the water is cooled, then drained to the stormwater conveyance system via a nearby catch basin. The discharge of boiler wastewater discharge is not authorized by the 1200Z permit. The City recommends either routing this water to the sanitary sewer for disposal, or re-use for washing, etc. If the facility elects to continue to discharge to storm, authorization from the DEQ is required. The DEQ permit for boiler discharge is the 500J permit, which is currently expired. The facility may apply for the expired 500J permit but is not authorized to discharge the boiler wastewater, until approved.
4. As requested during the inspection, photographs taken during the inspection are enclosed.

Recommendation:

1. Cover or remove old equipment stored in the boneyard behind the groundwater remediation building.

If you have any questions regarding this letter or need any additional assistance during this process, please feel free to contact me at (503) 823-7192.

Sincerely,



Laura Johnson  
Industrial Stormwater Program

2/13/19

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cc: Christine Svetkovich, Oregon Department of Environmental Quality  
Mike Pinney, Oregon Department of Environmental Quality  
Alex Liverman, Oregon Department of Environmental Quality  
Cindy Ryals, City of Portland Superfund Program  
Laura Castrilli, EPA

Enclosures: 1200Z Permit Application Packet  
Willamette River Impairment Pollutant list